

# Akin Gump

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February 16, 2022

Honorable Vernon S. Broderick  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

Re: Request to Expand Page Limit in *In Re: Methyl Tertiary Butyl Ether ("MTBE") Products Liability Litigation*, Master File No. 1:00 – 1898, MDL 1358, M21-88;  
No. 1:14-CV-06228-VSB

Dear Judge Broderick:

Defendants PJSC LUKOIL, LUKOIL Pan Americas, LLC, and LUKOIL North America LLC (collectively, the “Remaining LUKOIL Defendants”) respectfully request that this Court expand the word limit for its reply memorandum of law in support of their motions to dismiss to be filed on February 18, 2022. As with its opening memorandum of law, rather than submit three separate memoranda in support of their motions, the Remaining LUKOIL Defendants are planning to submit one reply memorandum of law that addresses each of their separate arguments in support of their motions to dismiss. The Remaining LUKOIL Defendants have endeavored to be as concise as possible, but require pages in excess of the 10-page limit required by this Court’s Rule 4.B. Accordingly, the Remaining LUKOIL Defendants respectfully request leave to file a reply memorandum of law of no more than 30 pages. The Commonwealth does not object to the Remaining LUKOIL Defendants’ request to exceed the Court’s page limit.

Sincerely,

/s/ Joseph L. Sorkin